



HON. SYLVIA O. HINDS-RADIX
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THE CITY OF NEW YORK
LAW DEPARTMENT
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June 8, 2022

BY ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Megan Heckard v. City of New York, et al.
21 CV 7166 (RPK) (CLP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, and attorney for defendants City of New York, former Mayor Bill De Blasio, former Commissioner Dermot Shea, and former New York City Police Department (“NYPD”) Chief Terence Monahan (hereinafter “defendants”) in the above-referenced matter. Defendants write to respectfully request a one week extension of time for defendants to respond to plaintiff’s Interrogatories and Document Requests and a corresponding extension of time for plaintiff to respond to defendants’ Interrogatories and Document Requests. Plaintiff’s counsel, Remy Green, consents to this request.

As the Court is aware, during the April 8, 2022 initial conference, Your Honor set the deadline for the parties to exchange document requests and interrogatories by May 9, 2022 and for the responses to be served by June 10, 2022. The undersigned requires additional time to serve defendants’ responses due to a number of pressing deadlines I am currently handling on other matters including being engaged in motion practice in several other matters which were previously scheduled. For the foregoing reasons, defendants respectfully request a one week extension of time for defendants to respond to plaintiff’s Interrogatories and Document Requests and a corresponding extension of time for plaintiff to respond to defendants’ Interrogatories and Document Requests, from June 10, 2022 until June 17, 2022.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

Inna Shapovalova

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cc: **By ECF**
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Remy Green
Attorney for plaintiff